

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

EXPERIMENTAL RATE AND SERVICE CHANGES
TO IMPLEMENT NEGOTIATED SERVICE AGREEMENT
WITH CAPITAL ONE SERVICES, INC.

Docket No. MC2002-2

JOINT MOTION OF THE UNITED STATES POSTAL SERVICE;
CAPITAL ONE SERVICES, INC.;
AND THE OFFICE OF THE CONSUMER ADVOCATE
FOR EXTENSION IN BRIEF SCHEDULE

The United States Postal Service; Capital One Services, Inc.; and the Office of the Consumer Advocate hereby move that the briefing schedule in this case be extended by two weeks in order to allow time to conclude settlement negotiations. These participants have made substantial progress in recently reconvened discussions and believe there is a significant likelihood of concluding a successful agreement which could be joined by other participants as well.

Because the existence of a settlement agreement, even if not ultimately joined by all intervenors, would significantly affect the relative positions taken by movants and could affect all other parties, the movants believe that a relatively short extension in the briefing schedule is in order. The Postal Service and Capital One believe that this extension would not delay implementation of the NSA, assuming the Commission ultimately recommends and the Governors approve the necessary implementing provisions requested in this case.

The new due dates requested would be April 3 for briefs and April 14 for reply briefs.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Scott L. Reiter

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Scott L. Reiter

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